

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Cr. No. 21-173 (PJS/DTS)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	<b>DEFENDANT’S MOTION TO</b>
v.	)	<b>LEAVE HALFWAY HOUSE</b>
	)	<b>FOR VALENTINE’S DAY</b>
GISELA CASTRO MEDINA (2),	)	
	)	
Defendant.	)	

The purpose of this motion is to respectfully request that Ms. Medina be permitted to be away from the halfway house from approximately 2:30 p.m. until 9:00 p.m. on February 14, 2022 for Valentine’s Day to spend the time with her family at her parents’ home. U.S. Probation Officer Michael Alberts has no objection to this motion. Assistant U.S. Attorney Laura Provinzino defers to Mr. Alberts, and thus, does not object.

On September 23, 2021, the Honorable Becky R. Thorson set conditions of release in Ms. Medina’s case (ECF No. 52). The conditions include home detention at a halfway house (*id.* at p. 3). On November 24, 2021, Ms. Medina requested permission to spend Thanksgiving Day at her parents’ house (ECF No. 91). This Court granted the request (ECF No. 93). On December 16, 2021, Ms. Medina requested permission to spend an overnight at her parents’ house for Christmas Eve and Christmas Day (ECF No. 109). This Court granted the request (ECF No. 111). On January 4, 2022, Ms. Medina requested permission to spend three separate days at her parents’ house for various holidays and her birthday (ECF No. 114). This Court granted the request (ECF No. 116).

While away from the halfway house, Ms. Medina complied with all of her conditions and did what she was asked.

Ms. Medina now moves this Court to allow her to leave the halfway house to spend Valentine's Day with her family at her parents' house. She seeks to be away from the halfway house from approximately 2:30 p.m. (whenever her treatment program is done) to 9:00 p.m. on February 14, 2022 with the following conditions:

1. Ms. Medina shall leave directly from treatment when her program is finished for the day (approximately 2:30 p.m.) and go to her parents' house. She shall be back at the halfway house no later than 9:00 p.m. Ms. Medina shall not make any unapproved stops during transit.
2. If any alcohol is present or any minors other than her sister arrive, Ms. Medina shall immediately leave and return to the halfway house.
3. Ms. Medina shall call the halfway house when she leaves treatment, when she arrives at her parents' house, and shall respond to their calls as directed by the halfway house.
4. All other pretrial release conditions remain in effect.
5. Ms. Medina must follow all COVID-19 guidance from the halfway house and understands that she may be unable to use the pass if she is under quarantine or the halfway house otherwise sets conditions or restricts her ability to leave on furlough.

Respectfully submitted,

**RYAN GARRY, ATTORNEY, LLC**

Dated: February 8, 2022

s/ Elizabeth Duel

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